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**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554**

FEDERAL COMMUNICATIONS COMMISSION
WASH. D.C. 20554

In the Matter of)
)
Revision of the Commission's Rules) **CC Docket No. 94-102**
to Ensure Compatibility With)
Enhanced 911 Emergency Calling)
Systems)

To: The Commission

COMMENTS OF THE RURAL TELECOMMUNICATIONS GROUP

The Rural Telecommunications Group ("RTG"), by its attorneys and pursuant to Section 1.415 of the Rules and Regulations of the Federal Communications Commission ("FCC" or "Commission") and the Commission's Public Notice, DA 98-1936 (released September 22, 1998), submits these Comments in response to the September 17, 1998 *ex parte* presentation of the Ad Hoc Alliance for Public Access to 911 ("Alliance") in which the Alliance modifies its Wireless 911 "Strongest Signal" Proposal presented earlier in this proceeding.

I. STATEMENT OF INTEREST

RTG is an organized group of rural telecommunications carriers formed to promote the efforts of its members and similarly-situated telecommunications providers to speed the delivery of new, efficient and innovative telecommunications technologies to the populations of remote and underserved areas of the country. RTG's members are both commercial mobile radio service ("CMRS") licensees and CMRS applicants who have or will have a statutory obligation to forward all 911 calls placed to their systems. As such, RTG's members would be affected by adoption of

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the Alliance's strongest signal proposal. RTG has submitted comments on various issues raised in this proceeding, and has previously commented on the Alliance's strongest signal proposal. RTG appreciates the opportunity to comment on the issues raised by the latest version of the Alliance's proposal.

II. COMMENTS

As RTG indicated in its Comments filed September 25, 1996 in this proceeding ("RTG Comments"), there are numerous technical impediments to requiring that 911 calls be sent to the cellular system with the strongest control channel signal:

As the Commission recognizes, with the evolution of cellular systems from analog to digital, common air interfaces between cellular systems may no longer exist. Accordingly, in many instances sending a 911 call to the strongest control channel signal will be technically impossible. In addition, even if both cellular systems in an area utilize the same technology, if a customer chooses to "block" his handset so that only the A side or B side carrier can be accessed, an attempt to send a call to the strongest signal may also be frustrated. Such handsets currently lack the intelligence to recognize the special nature of a 911 call, and thereby override the blocking mechanism. While a requirement imposed on equipment manufacturers to manufacture handsets with such an override capability may address this problem, it will not solve the problem of incompatible interfaces between analog and digital systems. Only if the Commission wishes to mandate the use of dual mode phones can such a problem be cured. RTG does not believe that the cost to the public of such a mandate warrants its adoption.

For these same reasons, the Commission should reject any suggestion that it require all wireless 911 calls to be handled by any available service, regardless of technology. The incompatible interface problem discussed above is exacerbated when applied to different communications services utilizing different technologies. These technical problems notwithstanding, given the nascency of personal communications service and other advanced wireless technologies, it is premature to adopt any requirement that 911 calls be accessed by multiple mobile systems at this time. Again, the Commission may want to revisit this issue

several years from now, after these various technologies have had a chance to develop.

RTG Comments at 7-8.

In addition, adoption of the strongest signal proposal has the potential to undermine the value of 911. The need to search for the strongest signal should in most cases engender a delay in connecting with the Public Safety Answering Point ("PSAP") of anywhere from seven to nine seconds. Such a requirement will thus cause a delay in emergency vehicle response time which though relatively small, may nonetheless in some cases be critical to preventing loss of life. In addition, while seven to nine seconds may not seem like a particularly long time under ordinary circumstances, to an individual seeking emergency assistance it will seem like an eternity. Individuals may even hang up and redial before they are connected to a PSAP, in the mistaken belief that they have somehow misdialed.

In its *ex parte* proposal, the Alliance suggests limiting the applicability of the proposed strongest signal requirement to instances where the signal from the user's provider is deemed "inadequate" (defined by the Alliance as less than -80 dBm). While well intentioned, this modification does not eliminate the technical problems inherent in the strongest signal requirement discussed above. Moreover, it is unlikely to achieve even its modest objective of limiting the number of instances where the channel selection will be made. Wireless customers currently tolerate signals much weaker than -80 dBm. A -80 dBm signal is more than adequate for communicating critical information. Should the Commission elect to adopt some form of a

strongest signal proposal, RTG suggests that the minimum signal quality triggering such a requirement be no stronger than -92 dBm.

For the foregoing reasons, RTG respectfully requests that the Federal Communications Commission act in a manner consistent with the views expressed herein.

Respectfully submitted.

RURAL TELECOMMUNICATIONS GROUP

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